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April 18, 2022

VIA ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

RE: Hebei Mighty Synthetic Rubber and Plastic Co., Ltd. v. Global Syn-Turf, Inc.

Case No.: 1:21-cv-10674-PAE

Dear Judge Engelmayer,

We write this letter pursuant to the Court's March 31, 2022 order to show cause requesting plaintiff to update the Court on status of service of the Summons and Complaint.

The defendant is represented by counsel, Structure Law Group, LLP. On December 15, 2021, upon defendant's counsel's request, we forwarded a copy of the filings to counsel and asked counsel to confirm if they will accept service. Defendant's counsel informed us that they were waiting for client confirmation on whether they have authority to accept service. However, defendant's counsel never got back to us despite several additional attempts from our office to reach them in December 2021 and in January 2022. As such, we began to work with a process server in January to effect service on the defendant.

The process server has been unable to successfully effect service to date. We sent our documents and instructions to the process server on January 24, 2022 for routine service on the defendant's address at 5960 Ingelwood Drive, Suite 150, Pleasanton California 94588. We were informed that service was attempted on February 21, 2022, but was unsuccessful. Specifically, the process server advised that the defendant's offices were fully furnished, but no one was there. The process server advised that they would attempt service again and also through alternate methods. We continued to follow up with the process server in March and April, but was informed each time that service was either not yet attempted, or that they are working on it. Most recently, the process server advised that they would attempt service again on April 18, 2022, but we have not heard back from them. Unfortunately, because of the aforementioned issues, we are currently in the process of working with another process server to effect service.

We humbly request an extension of no more than 30 days for our firm to effect process of service on the defendant. We thank the Court for its time and attention to this matter.

Respectfully,

Mazzola Lindstrom LLP

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